

April 23, 2012

*By Email: [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov)*

Jennifer J. Johnson  
Secretary Board of Governors of the Federal Reserve System  
20th Street & Constitution Avenue, NW  
Washington, DC 20551

**Re: FR Y-14A/Q/M OMB Control Number: 7100-0341.** (Capital Plans; Proposed Agency Information Collection Activities)

Dear Ms. Johnson:

The American Bankers Association, the Clearing House Association, and the Financial Services Roundtable (together, the Associations)<sup>1</sup> appreciate the opportunity to comment on the proposed changes to the Comprehensive Capital Analysis and Review (the CCAR) data collection schedules<sup>2</sup> (the Proposal) issued by the Board of Governors of the Federal Reserve System (the Board). Generally, the Proposal expands the number of respondent banks, implements new reporting schedules, and adds new data items to existing schedules.

As the Associations stated in our November 7 letter addressing the previous CCAR data collection,<sup>3</sup> there is significant merit to the comprehensive capital adequacy and risk review process envisioned by the Board. Such a comprehensive review, if it meaningfully incorporates the capital planning processes of firms and respects the traditional role of corporate boards, would assist the Board in ascertaining the appropriateness of capital distributions. In addition, the Associations appreciate that the Board has continued to publish the schedules for public comment. However, we have concerns with the Proposal, and these concerns have only grown since the release of the Board's 2012 stress test results. We urge the Board to address the concerns described in this letter when adopting the final data request. Part I of this letter discusses concerns related to the proposed quarterly operational risk schedule. Part II of the letter sets forth concerns related to the proposed changes to the quarterly wholesale reporting schedules. Part III and Annex A of this letter discuss concerns related to the proposed monthly schedules. Annex B includes requests for clarification on specific schedules and data fields.

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<sup>1</sup> Further information about the signatories is available in Annex C.

<sup>2</sup> 77 FR 10525 (February 22, 2012).

<sup>3</sup> Letter from ABA, FSR, SIFMA, and TCH dated November 7, 2011 in response to 76 FR 55288 (September 7, 2011).

The Associations also note the existence of several broad concerns:

- Prior to finalizing the rule, the Board should conduct a thorough cost-benefit analysis of the Proposal, particularly in light of the significant overlap of several of the proposed data collections with data already submitted to other regulators, the substantial data already required to be submitted by institutions as part of the CCAR process, and the substantial burden (42,145 hours for some institutions)<sup>4</sup> the Board has itself estimated the Proposal would impose. Given the lack of transparency in the models used by the Board during the 2012 CCAR process, it is unclear whether there will be a material increase in precision in the Board's loss forecasts as a result of the expanded data request. The Associations also note that the significant and continual changes to the data requests, which require significant lead time for banks to develop new data tracking systems, increase the risk of errors. The Associations believe that an adequately thorough cost-benefit analysis that takes into account the factors noted above will demonstrate that the substantial burden and costs to banks to implement the new reporting requirements outweigh the benefits.
- The Board should provide all banks sufficient time to develop systems to capture the requested data items. The Proposal revises the existing CCAR information collection to expand the number of respondent banks, implement new reporting schedules, and add new data items to existing schedules. The Proposal is scheduled to become effective June 30, 2012. Respondent banks will need to develop internal processes and procedures, hire or repurpose staff and expertise, and develop appropriate systems in order to comply with the requirements of the proposed data collection. Assuming that the reporting schedules are finalized within a month, banks will only have approximately 45 days to develop their systems to capture the June month-end data. We believe this timing is not practical. Given the substantial amount of new data requested in the Proposal, the Associations believe the effective date of the Proposal should be September 30, 2012, **at the earliest**.
- The Board should provide additional time to banks transitioning to the CCAR for the first time. The Proposal revises the existing CCAR information collection to expand the number of respondent banks. The new banks captured by the Proposal were formerly subject to the Capital Plan Review (CapPR) stress tests. Data submissions requested from the CapPR banks were not nearly as extensive as CCAR submissions. This reflected a recognition that the firms had not been through such a coordinated exercise before and that time might be needed to build and implement the internal systems necessary to satisfy the rigorous data collection requirements needed for a separate supervisory stress test. CapPR banks subject to the data collection for the first time face a much more difficult task developing their systems on the proposed time frame. Even if the general effective date of the Proposal is moved to September 30, 2012, the Associations urge that the effective date for CapPR banks should be December 31, 2012, **at the earliest**.

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<sup>4</sup> 42,145 hours assumes a bank would be required to fill out each of the schedules in the FR Y-14A, amended FR Y-14Q, and proposed FR Y-14M.

- Assuming a later effective period, CapPR banks should not be required to make disclosures in 2013. If CapPR banks' first quarterly data submission is in February 2013, the Board will not have the necessary inputs to run the supervisory stress tests. As a result, we urge the Board to repeat the 2012 treatment of CapPR banks and not require disclosure of stress testing results.
- The Federal banking agencies should coordinate their data collection practices so that banks only need to submit one set of data. The Associations note that in the credit card, mortgage, and home equity contexts, the Board is proposing to collect data that are already provided to other regulators (i.e. the OCC). We respectfully request that the Federal banking agencies work in a cooperative fashion to resolve promptly the differences between their similar reporting requirements. Moreover, the Federal banking agencies should develop, possibly under the auspices of the Federal Financial Institutions Examination Council, an interagency data repository to avoid needless duplication of data reporting and information gathering.
- The quarterly report (FR Y-14Q) should be submitted 60 days after the quarter end. Currently, the submission dates for the FR Y-14Q mirrors the FR Y-9 submission schedule. Although no changes are being proposed to the submission due dates for the FR Y-14Q data, the Board solicited feedback as to whether the quarterly submissions schedule is problematic for institutions. It is challenging for bank staff to deliver two major regulatory reports on the same day. This challenge is made more difficult since the FR Y-14Q needs to be reconciled with certain aspects of the FR Y-9. The Associations urge the Board to set the submission date of the FR Y-14Q to 60 days after quarter end. This timeframe will support complete and accurate data submissions and alleviate unnecessary pressure on bank staff.
- In light of the increased granularity of the data requested, the Board should adopt less adverse assumptions for data gaps. The increased granularity of the data request will likely lead to more data gaps in the submission. As a result of the difficulty providing all the requested data (if sufficient time is not given for technology developments), the Associations are concerned that a greater portion of bank portfolios will receive punitive treatment in the Board's forecasts. We urge the Board to adopt less adverse treatment of data gaps.
- Non-Basel II banks should not be required to provide data based on Basel II methodologies and definitions. The Proposal requires banks to use Basel II methodologies and definitions. However, not all banks subject to the proposal are subject to Basel II. We urge the Board to take a flexible approach to non-Basel II banks and allow them to provide data in a manner consistent with internal processes.
- The Board should immediately clarify when/if CapPR banks need to provide historical data. During the 2011 data collection exercise, CCAR banks were required to provide historical data as part of their initial submission. The Proposal makes no mention of CapPR banks, which are subject to the collection for the first time, providing historical data. This has led to confusion within the industry and made it difficult for CapPR banks to allocate resources appropriately. We urge the Board to clarify immediately whether

CapPR banks are expected to provide historical data as part of their initial submission. Any requirement for CapPR banks to provide historical data should be accompanied by a delayed submission date.

- For assets acquired as part of a merger or acquisition, the Board should provide the acquiring bank with a year to incorporate the assets into its systems before requiring data to be submitted. Banks have complex and varied systems for tracking loan level data. If one bank acquires another bank, the acquiring bank should be given a year to bring the loans onto its systems before reporting any loan level data to the Board.

## **I. Proposed Operational Risk Data Collection Schedule**

### Background

The current FR Y-14A Operational Risk worksheets (contained within the annual summary schedule) collect a BHC's projections for operational losses. Additional details are also collected on translating historical loss experience into operational loss projections and on budgeting processes used to project operational losses. The Proposal adds a new quarterly operational loss data collection. This data collection would include the type of loss event, when it occurred, the loss amount, the business line in which it occurred, and other relevant information.

### Substantive Concerns

*Banks should not be required to submit their legal reserves for pending and probable litigation claims*

The Proposal appears to require banks to disclose to the Board their legal reserves for pending and probable litigation claims. Requiring banks to disclose their legal reserves for pending and probable litigation claims would be unwise, unsound, and highly prejudicial, and should not be pursued. Legal reserves for litigation claims are established by banks in consultation with their legal counsel and often, if not always, entail the exercise of significant professional judgment by experienced legal counsel in weighing the relative strengths of claims and defenses in light of existing law and factual developments. Hence, legal reserves are both privileged and highly confidential. Any disclosure of legal reserves would subject banks to significant prejudice, as it would both inform their adversaries of how banks weigh the strengths/weaknesses of the subject claims and establish a floor for plaintiffs' settlement demands on those claims. Potential prejudice to the banks also looms in the risk that adversaries could seek to introduce the reserves as evidence in the litigation, as admissions of liability or the amount of damages. Furthermore, were the banks required to provide these data to the Board as part of the CCAR exercise, there can be no assurance that they would remain confidential. CCAR requires massive efforts by the Board, with a large number of staff devoted to analyzing all of the data provided by banks. Wide dissemination of reserve data, even within the Board, necessarily reduces the ability to maintain strict confidentiality, and the prospect of inadvertent or erroneous disclosure is substantial. Along the same lines, it would be difficult for the Board to resist any request by Congress to obtain these data, which would then be susceptible to broad public dissemination. As a result of the severe prejudice to banks that this disclosure would entail, coupled with the substantial risk

of that very result, the Associations strongly urge the Board not to require banks to disclose reserves data as part of their CCAR submissions.

*The quarterly operational risk data submission should be on a one quarter lag*

Accuracy and completeness of operational loss data are of the utmost importance to banks. Correspondingly, each bank has established a variety of quality control and validation activities within its operational loss data collection process and this process takes approximately 120 days. As a result, the Associations urge the Board to permit banks to submit their FR Y-14Q operational loss data on a one quarter lag in order to ensure accurate and comprehensive data is submitted.

*Banks should be given flexibility in how they present data to the Board*

The Proposal mandates that each BHC report operational loss events that were 1) captured in the institutions loss database during the current reporting quarter and 2) operational loss event that were reported during a prior reporting quarter, but were amended during the current reporting quarter. However, data consortiums are increasingly asking members to report their entire dataset, not just the quarterly changes. This is because it becomes overly burdensome to track all the revisions that take place during a quarter as the number of events accumulates in the database. As a result, we urge the Board to give banks the option to provide limited quarterly data as proposed or provide the entire data set. Providing this option would significantly reduce the burden of the proposed operational risk schedule.

*The Board should only require banks to submit data on events of \$20,000 or more*

The Proposal mandates that each bank report all operational loss events at and above the collection threshold established by the bank. However, collection thresholds vary widely across banks. Some banks track loss events down to a penny but use events above a certain threshold for capital modeling purposes. As a result, we urge the Board to establish an event threshold of \$20,000 or, at the option of the bank, include lesser events if the lesser events are included into the capital model. Additionally, it may reduce burden on the Board, as it is unclear as to whether Federal Reserve systems or processes are able to accommodate the volume of data that would be submitted once consolidated across all Banks subject to this proposal.

*The threshold for the "description" field should be raised to \$10 million, and banks should be held to a best efforts standard to provide a description*

For all operational loss events with gross loss amounts greater than \$100,000 Column R of the proposed schedule mandates a detailed description of the loss event. We understand the need for detailed information on a tail event. However, the Associations see no benefit from providing a description for \$100 thousand loss events and are concerned about the burden on banks to provide descriptions for each event above this threshold. This requirement is a significant burden, because each description needs to be reviewed by bank staff to ensure it does not include customer or account information. As a result, we urge the Board to raise the threshold to \$10 million and to apply a best efforts standard to banks when asking for a description. A bank should not be required to provide more than the causal factors of an event.

*The Board should provide flexibility with how each loss event is assigned to a business line(s), event type(s), or accounting date(s)*

The Proposal mandates that each loss event should be reported as a single entry, even if it crosses multiple business lines, event types, or has multiple accounting dates. For example, the proposal mandates if a single loss event impacted multiple business lines or functions, the bank must report the event as a single entry and apply the aggregated gross loss amount to the business line that was assigned the highest loss amount. This approach is inconsistent with many institutions' current practices. When an event is split between multiple lines of business, some banks allocate the loss to multiple business lines when modeling capital (the losses may be aggregated across business lines using the same event ID). Even at banks that assign the entire loss to a single business line, these banks often assign the loss to a business line on a "fault basis" not a "loss basis." Often the business line most responsible for the loss is not the business line that suffers the highest loss amount. As a result, we urge the Board to allow banks to assign loss amounts by business line, event type, or accounting date in a manner consistent with current bank practices.

## **II. Proposed Changes to the Wholesale Schedule**

### **Background**

The current corporate loan collection gathers loan-level data that focuses on data stored in banks' systems of records, particularly their loan accounting systems. While the granular loan-level data provide additional insights into certain credit risk characteristics, the Board believes that the data items in the existing corporate loan collection are not sufficient to evaluate all aspects of credit risk or produce an independent probability of default (PD). In order to understand better the credit risk associated with banks' corporate loan exposures, the Proposal adds 35 data items to the collection. These data items are intended to allow the Board to derive an independent PD for both public and private firms.

### **Substantive Concerns**

*It is unnecessary for the Board to model PD*

Banks understand that the Board may have certain concerns about the consistency of obligor and facility grades within the CCAR Corporate template reporting. However, the addition of several of the proposed data elements may be unnecessary, may not provide the consistency that is sought, and would tremendously increase the burden on the banks to provide these very granular data.

Currently, banks typically have periodic, recurring internal reviews of their obligor and facility grade assignments which are supported by empirical and qualitative assessments to ensure rating accuracy – including i) reviews by the Credit Audit functions that provide independent review and credible challenge to the ratings programs in the banks and ii) periodic reviews by the banks' regulatory examiners, including Basel-related certification as banks seek to exit their parallel run, reinforcing the level of consistency in the assignment of obligor and facility ratings.

Within the FR Y14-Q Corporate template, banks already have been providing their obligor and facility ratings. Through the use of the respective concordance tables, the Board can translate banks' internal ratings to an equivalent ratings agency grade level. These agency grades can be further translated into a default probability for each obligor and facility. Indeed, as mentioned on the CCAR Corporate and CRE template follow-up call with the Board and CCAR banks after the stress test results were announced, the Board noted that they used this same approach in order to categorize the risk profiles of banks' portfolios for developing the credit losses on these credit portfolios.

We believe it would be challenging for the Federal Reserve to derive accurate obligor and facility grades solely from the proposed data elements due to the unique nature of this information with respect to clients, industries, geographies, etc. Banks' models for assigning grades may use additional information that takes into account the nature of the obligor and structure of the facility in question more accurately. For example, for many large obligors, bank models for assigning grades will incorporate expert staff judgment in addition to various quantitative factors.

In addition and importantly, the burden on the banks to support several of these new data elements will be significant. Many banks currently do not include these data elements in centralized credit risk infrastructure – indeed some models developed for certain clients and industries are tailored to the nature of credit risk for those industries. For example, models to support lending to utilities may be different from those that support energy, mining, leasing companies, etc.

As a result of the Board's ability to project losses using bank generated PDs and the significant burden of the data request, we urge the Board not to request the 35 new data items and to continue to use bank generated PDs to estimate losses for the CCAR.

*The Board should apply a best efforts standard to the corporate loan data items*

As mentioned above, many of the new data items requested are not in bank loan systems. As a result, it is likely that there could be significant data gaps where the data items could not be found by the submission date. We urge the Board to apply a best efforts standard to the corporate loan data collection.

*The Board should not require banks to provide a guarantor's tax ID number*

In addition to requesting data items that can be used to generate PDs, the Proposal also requires banks to provide miscellaneous information about guarantors. This includes a guarantor's tax ID number. The Associations do not believe providing a guarantor's tax ID number is relevant and are concerned that providing this information could raise privacy issues. As a result, we urge the Board not to request this data item.

## **Proposed FR Y-14M**

### Background

The Proposal increases frequency of reporting for three retail portfolios from quarterly to monthly (the proposed FR Y-14M). The current quarterly retail risk schedule collects data on several portfolio-level worksheets, including: one domestic closed-end first lien residential mortgage worksheet, two domestic home equity worksheets (domestic closed-end home equity loans and domestic home equity lines of credit), and two domestic credit card worksheets (domestic charge card and domestic small and medium size enterprise corporate cards). The Proposal replaces these quarterly portfolio-level worksheets with the following monthly collections:

- one loan-level collection for Domestic First Lien Closed-End 1-4 Family Residential Mortgage data,
- one loan-level collection for Domestic Home Equity Residential Mortgage data, and
- one account- and portfolio-level collection for Domestic Credit Card data.

*The Federal banking agencies should coordinate their data requests*

The Associations note that much of the credit card, mortgage, and home equity data that the Board is proposing to collect are already provided to the OCC. Attached to this letter in Annex A is a chart identifying data fields in the Board proposal that are similar to existing data fields provided to the OCC. In the first lien residential loan schedule, 60 of the data fields were similar to data fields in the OCC's Loss Mitigation Loan Level Data Collection. In the Home Equity Loan and Home Equity Line of Credit Schedule, again 60 of the data fields were similar to data fields collected by the OCC. Finally, in the proposed credit card collection, 54 of the data fields were similar to data fields collected by the OCC. In total, 174 of 256 of the data fields collected in the proposed schedules to significant degree correspond to data fields already requested by the OCC. We respectfully request that the Federal banking agencies work in a cooperative fashion to resolve promptly the differences among their respective, similar reporting requirements. Moreover, the Federal banking agencies should develop, possibly under the auspices of the Federal Financial Institution Examination Council, an interagency data repository to avoid needless duplication of data reporting and information gathering.

*Data on loans that are serviced by third parties should be collected at portfolio levels on a delay*

The Proposal requires bank holding companies to provide data on individual loans each month with the report submitted no later than 30 calendar days after the end of the reporting month. The Proposal does not distinguish between loans serviced by the bank and loans serviced by third parties. Many banks may incur expenses for third parties to provide the requested data, as the reporting is not covered under existing agreements. As the additional reporting is not currently required under existing agreements, it is unclear whether servicers are able and or willing to provide the additional data at a reasonable cost. It is very unlikely even if a servicer is able and willing to provide the additional data for a reasonable cost that agreements can be



negotiated and computer systems or reporting systems can be reprogrammed within the proposed time frame. Additionally, even once reporting systems have been reprogrammed, banks would not be able to provide the data to the Board within the 30 day timeframe as there would be insufficient time for banks to review, analyze, and validate the data. Therefore, we would urge the Board to allow the banks to submit the data on third party serviced loans on a one month lag with submission 60 days after month end. Furthermore, we urge the Board to allow banks to provide data for loans serviced by third parties at a portfolio level on a best efforts basis.

*At origination data should be subject to a best efforts standard.*

In numerous contexts, the Proposal requires banks to provide at origination data. These data are generally not tracked by many banks and will be difficult, or perhaps even impossible, for many institutions to gather. As a result, we urge the Board to adopt a best effort standard for banks providing these data. If an institution is unable to provide at origination data, the institution should be permitted to substitute current data for that field.

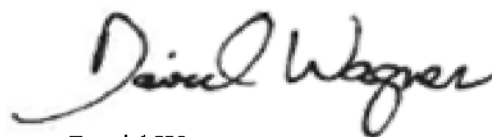
Thank you for considering the concerns raised in this letter. We appreciate the opportunity to share our views and would be happy to discuss any of them further at your convenience. Given the rapidly approaching proposed submission dates and the significant effort involved in gathering the required data and populating the templates, it is critically important for the Board to respond to the Associations' proposals, recommendations, and requests for clarification in an expedited manner.

If you have any questions, please contact Hugh C. Carney, Senior Counsel, of the ABA at (202) 663-5324 (e-mail: [hcarney@aba.com](mailto:hcarney@aba.com)), David Wagner, Senior Vice President, of the Clearing House at (212) 613-9883 (email: [David.Wagner@theclearinghouse.org](mailto:David.Wagner@theclearinghouse.org)), and Brian Tate, Vice President, of the Financial Services Roundtable at (202) 589-2417 (email: [brian@fsround.org](mailto:brian@fsround.org)).

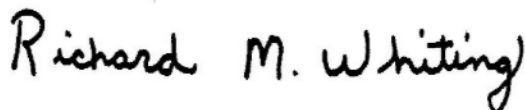
Sincerely,



Hugh C. Carney  
Senior Counsel  
American Banks Association



David Wagner  
Vice President  
The Clearing House



Richard M. Whiting  
Executive Director and General Counsel  
Financial Services Roundtable

## Annex A

**Table 1-Comparison of OCC’s “Loss Mitigation Loan-Level Data Collection Mortgage” to the Proposal**

Existing OCC Data Request		Proposed FRB Data Request		OCC Fields that Correspond to Propose Fields	
#	Name	#	Name	#	Name
1	Loan Number	1	Loan Number	1	Loan Number
2	Lien Position At Origination	2	Loan Closing (for Origination) Date	8	Loan Closing Date
3	Credit Grade	3	First Payment Date		
4	Investor	4	Property State	23	Property State
5	Product Group	5	Property Zip Code	24	Property ZIP Code
6	Interest Type at Origination	6	Original Loan Amount	9	Original Loan Amount
7	Interest Type in Current Month	7	Appraisal Amount - Original Property Value	60	Original property value
8	Loan Closing Date	8	Original LTV	13	Original LTV
9	Original Loan Amount	9	Original Combined LTV		
10	Unpaid Principal Balance	10	Documentation Type	22	Documentation
11	Original Interest Rate	11	Debt to Income (DTI) Ratio - Back-end at Origination	47	Debt to Income Back-End
12	Current Interest Rate	12	Debt to Income (DTI) Ratio - Front-end at Origination	87	DTI ratio (front-end) at Origination
13	Original LTV	13	Origination FICO	15	Original FICO
14	Refreshed LTV	14	Occupancy	37	Owner Occupancy Flag
15	Original FICO	15	Credit Class	40	Credit Class
16	Current FICO	16	Loan Type		
17	Product Description	17	Lien Position at Origination	2	Lien Position At Origination
18	Option ARM at Origination	18	Loan Source	36	Loan Source
19	Option ARM in Reporting Month	19	Product Type	17	Product Description
20	Interest Only at Origination	20	Loan purpose coding		
21	Interest Only in reporting Month	21	Number of Units		
22	Documentation	22	MI Company		
23	Property State	23	Mortgage Insurance coverage percent at origination		
24	Property ZIP Code	24	Property Type	41	Property Type
25	Loss Mitigation Performance Status	25	Balloon Flag		
26	Foreclosure Status	26	Balloon Term	57	Balloon Term
27	Foreclosure Referral Date	27	Buy down Flag		
28	Liquidation Status	28	Interest Only at Origination	20	Interest Only at Origination
29	Foreclosure Sale Date	29	Recourse Flag		
30	Workout Type Completed	30	ARM Initial Rate		
31	Next Payment Due Date	31	ARM Initial Rate period	42	ARM Initial Rate Period
32	Bankruptcy Flag	32	ARM Periodic Interest Reset Period		
33	Active Repayment Plan Flag	33	ARM Index	91	ARM Index
34	Loss Mit Letter Sent	34	ARM Look Back (in Days)		
35	Reason for Default	35	ARM Margin at Origination	89	ARM Margin at Origination
36	Loan Source	36	ARM negative amortization % limit		
37	Owner Occupancy Flag	37	ARM Periodic Rate Cap		

38	Notice of Default	38	ARM Periodic Rate Floor		
39	Third Party Sale Flag	39	ARM lifetime Rate Cap		
40	Credit Class	40	ARM lifetime Rate Floor		
41	Property Type	41	ARM Periodic Pay Cap		
42	ARM Initial Rate Period	42	ARM Periodic Pay Floor		
43	Modification Type	43	Option ARM Flag	18	Option ARM at Origination
44	Original Loan Term	44	Negative Amortization Flag		
45	Loss / Writedown Amount	45	Original Loan Term	44	Original Loan Term
46	Loss Writedown Date	46	P & I Frequency		
47	Debt to Income Back-End	47	Original Interest Rate	11	Original Interest Rate
48	Foreclosure Suspended	48	P & I Amount at Origination	83	Principal and Interest (P&I) amount at origination
49	Prepayment Penalty Waived this Month	49	Pre-payment penalty flag		
50	ARM Last Reset Date	50	Pre-payment penalty term		
51	ARM Next Reset Date	51	Current FICO	16	Current FICO
52	Prepayment Penalty Waived Amount	52	Interest Only in Reporting Month	21	Interest Only in reporting Month
53	Last Modified Date	53	Investor Type		
54	Troubled Debt Restructure	54	Servicer Advances	59	Servicer Advances
55	FHA Secure Refinance Flag	55	Option ARM in Reporting Month	19	Option ARM in Reporting Month
56	Remodified Flag	56	Bankruptcy flag	32	Bankruptcy Flag
57	Balloon Term	57	Bankruptcy Chapter		
58	Repayment Plan Performance Status	58	Next payment due date	31	Next Payment Due Date
59	Servicer Advances	59	Current Interest Rate	12	Current Interest Rate
60	Original property value	60	Remaining Term	88	Remaining Term
61	Refreshed property value	61	Scheduled principal balance amount		
62	Property valuation method at origination	62	P & I Amount Current	84	Principal and Interest (P&I) amount-current
63	Refreshed property valuation method	63	Principal Balance	10	Unpaid Principal Balance
64	Most recent property valuation	64	Foreclosure sale date	29	Foreclosure Sale Date
65	FHMA Home Saver Advance Date	65	Foreclosure referral date	27	Foreclosure Referral Date
66	FHMA Home Saver Advance Amount	66	Foreclosure suspended	48	Foreclosure Suspended
67	Alternative Home Liquidation Loss Mitigation Date	67	Paid-in-full coding		
68	Alternative Home Retention Loss Mitigation Date	68	Foreclosure Status	26	Foreclosure Status
69	Principal Deferred/Forbearance	69	Repurchase Type		
70	Principal Write-down/Forgiveness	70	Repurchase Request Date		
71	Capitalization	71	Refreshed Property Value	61	Refreshed property value
72	Interest Rate Reduced	72	Refreshed Property Valuation Method	63	Refreshed property valuation method
73	Interest Rate Frozen	73	Most Recent Property Valuation Date	64	Most recent property valuation
74	Term Extended	74	Refreshed CLTV After modification	81	Refreshed CLTV after modification
75	Duration of Modification	75	Refreshed DTI Ratio (Back-end)	77	Refreshed DTI Ratio (Back-

					end)
76	Refreshed DTI Ratio (front-end)	76	Refreshed DTI Ratio (Front-end)	76	Refreshed DTI Ratio (front-end)
77	Refreshed DTI Ratio (Back-end)	77	Modification type	43	Modification Type
78	step modification flag	78	Last Modified Date		
79	Principal Deferred Amount	79	Active Repayment Plan Flag		
80	Delinquent amount capitalized	80	Workout Type Completed	30	Workout Type Completed
81	Refreshed CLTV after modification	81	Repayment Plan Performance Status		
82	Property valuation method at modification	82	"Home Affordable Refinance" Program Flag	99	Home Affordable Refinance flag
83	Principal and Interest (P&I) amount at origination	83	"Home Affordable Refinance" Program Loan ID		
84	Principal and Interest (P&I) amount-current	84	Capitalization	71	Capitalization
85	Escrow at Origination	85	Delinquent Amount Capitalized	80	Delinquent amount capitalized
86	Escrow amount current	86	Duration of Modification	75	Duration of Modification
87	DTI ratio (front-end) at Origination	87	Step Modification Flag	78	step modification flag
88	Remaining Term	88	Loss Mitigation Performance Status		
89	ARM Margin at Origination	89	Principal Deferred	69	Principal Deferred/Forbearance
90	ARM Margin-current	90	Principal Deferred Amount	79	Principal Deferred Amount
91	ARM Index	91	Principal Write-down	70	Principal Write-down/Forgiveness
92	P&I Amount Before Modification	92	Principal Write-down Amount	103	Principal write-down amount
93	P&I Amount After Modification	93	Property Valuation Method at Modification	82	Property valuation method at modification
94	Escrow Amount After Modification	94	Interest type Conversion Duration		
95	Interest rate before modification	95	Loss / Writedown Amount	45	Loss / Writedown Amount
96	Interest rate after mod	96	Loss / Writedown Date	46	Loss Writedown Date
97	Remaining Term before modification	97	SOP 03-3 Status		
98	Remaining term after modification	98	Total Debt at Time of REO		
99	Home Affordable Refinance flag	99	Net Recovery Amount		
100	Interest Type Conversion	100	Credit enhanced amount		
101	Reported as Bank Owned Flag				
102	Serviced for Others Investor				
103	Principal write-down amount				

**Table 2-Comparison of OCC’s “Loss Mitigation Loan-Level Data Collection Home Equity”  
to the Proposal**

Existing OCC Data Request		Proposed FRB Data Request		OCC Fields that Correspond to Propose Fields	
#	Name	#	Name	#	Name
1	Loan Number	1	Loan Number	1	Loan Number
2	Lien Position At Origination	2	Loan Closing (for Origination) Date	7	Loan Closing Date
3	Loan/Line Owner	3	First Payment Date		
4	Home Equity Type	4	Property State	21	Property State
5	Interest Type at Origination	5	Property Zip Code	22	Property ZIP Code
6	Interest Type in Current Month	6	Original Loan Amount	8	Original Loan Amount
7	Loan Closing Date	7	Original Loan / Line Amount		
8	Original Loan Amount	8	Appraisal Amount - Original Property Value	59	Original property value
9	Current Credit Line Amount	9	Original Combined LTV	13	Original Combined LTV
10	Unpaid Principal Balance (Gross)	10	Documentation Type	19	Income Documentation
11	Original Interest Rate	11	Debt to Income (DTI) Ratio - Back-end at Origination	41	Debt to Income Back-End
12	Current Interest Rate	12	Debt to Income (DTI) Ratio - Front-end at Origination		
13	Original Combined LTV	13	Origination FICO	15	Original FICO
14	Current combined LTV	14	Current FICO	16	Current FICO
15	Original FICO	15	Occupancy	32	Owner Occupancy Flag
16	Current FICO	16	Lien Position at Origination	2	Lien Position At Origination
17	Interest Only at Origination	17	Home Equity Line Type	4	Home Equity Type
18	Interest Only in Reporting Month	18	Number of Units		
19	Income Documentation	19	Property Type	36	Property Type
20	Asset Documentation	20	Interest Type at Origination	5	Interest Type at Origination
21	Property State	21	Interest Only at Origination	17	Interest Only at Origination
22	Property ZIP Code	22	Interest Only in Reporting Month	18	Interest Only in Reporting Month
23	Foreclosure Status	23	Duration of Interest Only Payments		
24	Foreclosure Referral Date	24	Loan Source	31	Loan Source
25	Liquidation Status	25	Credit Class	35	Credit Class
26	Foreclosure Sale Date	26	Loan / Line Owner	3	LOAN/LINE OWNER
27	Workout Type Completed/Executed	27	ARM Initial Rate period		
28	Next Payment Due Date	28	ARM Payment Reset Frequency		
29	Bankruptcy Flag	29	Allowable Draw Period	46	Draw Period
30	Reason for Default	30	ARM Index		
31	Loan Source	31	ARM Margin at Origination		
32	Owner Occupancy Flag	32	ARM Periodic Rate Cap		
33	Notice of Default (Breach Letter)	33	ARM Periodic Rate Floor		
34	Third Party Sale Flag	34	ARM lifetime Rate Cap		
35	Credit Class	35	ARM lifetime Rate Floor		
36	Property Type	36	ARM Periodic Pay Cap		
37	Modification Type	37	ARM Periodic Pay Floor		

38	Original Loan Term	38	Original Loan Term	38	Original Loan Term
39	Loss / Writedown Amount	39	Bankruptcy flag	29	Bankruptcy Flag
40	Loss Writedown Date	40	Next payment due date	28	Next Payment Due Date
41	Debt to Income Back-End	41	P & I Frequency		
42	Foreclosure Suspended	42	Original Interest Rate	11	Original Interest Rate
43	Last Modified Date	43	Current Interest Rate	12	Current Interest Rate
44	Troubled Debt Restructure Date	44	Interest Type in Current Month	6	Interest Type in Current Month
45	1st Mortgage Serviced in House	45	Total Payment Due	54	Minimum payment amount
46	Draw Period	46	P & I Amount Current	55	Actual payment amount
47	Settlement Negotiated Amount	47	Principal Balance	10	Unpaid Principal Balance (Gross)
48	Credit Line Frozen Flag	48	Monthly Draw Amount		
49	Locked Amount-Amortizing-LOC	49	Current Credit Limit	9	Current Credit Line Amount
50	Locked Amount-Interest Only-LOC	50	Loan Status (MBA method)		
51	Last Draw Date	51	Foreclosure referral date	24	Foreclosure Referral Date
52	Remodified Flag	52	Foreclosure sale date	26	Foreclosure Sale Date
53	Repayment Plan Start Date	53	Pre-payment penalty flag		
54	Minimum payment amount	54	Pre-payment penalty term		
55	Actual payment amount	55	Paid-in-full coding		
56	Lockout Feature Flag	56	Foreclosure Status	23	Foreclosure Status
57	Repayment Plan Performance Status	57	Loss / Writedown Amount	39	Loss / Writedown Amount
58	Servicer Advances	58	Loss / Writedown Date	40	Loss Writedown Date
59	Original property value	59	Liquidation Status	25	Liquidation Status
60	Refreshed property value	60	Troubled Debt Restructure	44	Troubled Debt Restructure Date
61	Property valuation method at origination	61	Repayment Plan Performance Status	57	Repayment Plan Performance Status
62	Refreshed property valuation method	62	Capitalization	70	Capitalization
63	Most recent property valuation	63	Interest Rate Frozen	72	Interest Rate Frozen
64	Loss Mitigation Performance Status	64	Principal Deferred	71	Principal Deferred
65	Credit Line Closed Flag	65	SOP 03-3 Status	74	SPO-03-03
66	Property Type Descriptors	66	Workout Type Completed	27	Workout Type Completed/Executed
67	Rate Reduction	67	First Mortgage Serviced In House	45	1st Mortgage Serviced in House
68	Term Modification	68	Settlement Negotiated Amount	47	Settlement Negotiated Amount
69	Principal Write Down	69	Credit Line Frozen Flag	48	Credit Line Frozen Flag
70	Capitalization	70	Locked Amount - Amortizing - LOC	49	Locked Amount-Amortizing-LOC
71	Principal Deferred	71	Locked Amount - Interest Only - LOC	50	Locked Amount-Interest Only-LOC
72	Interest Rate Frozen	72	Repayment Plan Start Date	53	Repayment Plan Start Date
73	Other	73	Actual Payment Amount	55	Actual payment amount
74	SPO-03-03	74	Lockout Feature Flag	56	Lockout Feature Flag
75	Line Reage (changed field name from Loan Reage)	75	Credit Line Closed Flag	65	Credit Line Closed Flag
76	Loan Extension	76	Rate Reduction	67	Rate Reduction

77	Net Unpaid Principal Balance	77	Term Modification	68	<b>Term Modification</b>
78	Accrual Status	78	Principal Writedown	69	<b>Principal Write Down</b>
		79	Line Reage	75	<b>Line Reage (changed field name from Loan Reage)</b>
		80	Loan Extension	76	<b>Loan Extension</b>
		81	Unpaid Principal Balance (Net)	77	<b>Net Unpaid Principal Balance</b>

**Table 3-Comparison of OCC’s “OCC Field Definitions – Credit Card Metrics” to the Proposal**

Existing OCC Data Request		Proposed FRB Data Request		OCC Fields that Correspond to Propose Fields	
#	Name	#	Name	#	Name
1	Reference Number	1	Reference Number	1	Reference Number
2	Account State	2	Customer ID		
3	Account Zip Code	3	Bank ID		
4	Account Country	4	Period ID		
5	Credit Card Type	5	State	2	Account State
6	Product Type	6	Zip Code	3	Account Zip Code
7	Secured Credit Card	7	Credit Card Type	5	Credit Card Type
8	Loan Channel	8	Product type	6	Product Type
9	Month Ending Balance	9	Lending Type		
10	Cycle Ending Balance	10	Revolve Feature		
11	Cycle Ending Balance Mix - Promotional Rate	11	Network ID		
12	Cycle Ending Balance Mix - Cash Advance Rate	12	Secured Credit Type	7	Secured Credit Card
13	Cycle Ending Balance Mix - Default or Penalty Pricing	13	Loan/Source Channel	8	Loan Channel
14	Cycle Ending Balance Mix - Other	14	SOP 03-3 flag		
15	Cycle Ending Average Daily Balance (ADB)	15	Cycle ending Balance	10	Cycle Ending Balance
16	Account Cycle End Date	16	Cycle Ending Balance Flag		
17	Account Origination Date	17	Accounts Under Promotion		
18	Multiple Banking Relationships	18	Cycle Ending Balances Mix - Promotional	11	Cycle Ending Balance Mix - Promotional Rate
19	Multiple Credit Card Relationships	19	Cycle Ending Balances Mix - Cash	12	Cycle Ending Balance Mix - Cash Advance Rate
20	Joint Account	20	Cycle Ending Balances Mix - Penalty	13	Cycle Ending Balance Mix - Default or Penalty Pricing
21	Eligible for Securitization	21	Cycle Ending Balances Mix - Other	14	Cycle Ending Balance Mix - Other
22	Borrower Income	22	Average Daily Balance (ADB)	15	Cycle Ending Average Daily Balance (ADB)
23	Borrower Income Type	23	Total Reward Cash		
24	Updated Borrower Income	24	Reward Type		
25	Updated Borrower Income Type	25	Account Cycle Date	16	Account Cycle End Date
26	Date Updated Borrower Income	26	Account Origination Date	17	Account Origination Date
27	Original Fico Score Primary Borrower	27	Acquisition Date Flag		
28	Original Fico Score Co Borrower	28	Multiple Banking Relationships	18	Multiple Banking Relationships
29	Refreshed FICO Primary Borrower	29	Multiple Credit Card Relationships	19	Multiple Credit Card Relationships
30	Fico Score Refresh Date	30	Joint Account	20	Joint Account
31	Behavioral Score	31	Nbr of Authorized Users		
32	Original Credit Limit	32	Securitized Flag	21	Eligible for Securitization
33	Current Credit Limit	33	Borrower's Income at Origination	22	Borrower Income
34	Current Cash Advance Credit Limit	34	Income Source at Origination	23	Borrower Income Type



35	Line Frozen in current Month	35	Updated Borrower's Income	24	Updated Borrower Income
36	Line Decrease in current Month	36	Updated Income Source	25	Updated Borrower Income Type
37	Line Increase in current Month	37	Data Refreshed Income Obtained	26	Date Updated Borrower Income
38	Preset Spending Limit	38	Original FICO Score - primary	27	Original Fico Score Primary Borrower
39	Minimum Payment Due Amount	39	Original FICO Score - co-borrower	28	Original Fico Score Co Borrower
40	Total Payment Due Amount	40	Refreshed FICO Score	29	Refreshed FICO Primary Borrower
41	Next Payment Due Date	41	FICO Score Refresh Date	30	Fico Score Refresh Date
42	Actual Payment Amount	42	Behavioral Score	31	Behavioral Score
43	Other Credits	43	Original Credit Limit	32	Original Credit Limit
44	Total Past Due Amount	44	Current Credit Limit	33	Current Credit Limit
45	Days Past Due	45	Current Cash Advance Limit	34	Current Cash Advance Credit Limit
46	Cycles Past Due at Cycle End	46	Line Frozen in the current month	35	Line Frozen in current Month
47	Cycles Past Due at Month End	47	Line Increase or Decrease in the current month	36	combo of 36-37
48	Account Ever 60+ Days Past Due in the last 3 years	48	Minimum Payment Due	39	Minimum Payment Due Amount
49	Interest Type	49	Total Payment Due	40	Total Payment Due Amount
50	APR (Retail) at Cycle End	50	Next Payment Due Date	41	Next Payment Due Date
51	Finance Charge	51	Actual Payment Amount	42	Actual Payment Amount
52	Late Fee	52	Total Past Due	44	Total Past Due Amount
53	Overlimit Fee	53	Days Past Due	45	Days Past Due
54	NSF Fee	54	Account 60+ in last 3 years	48	Account Ever 60+ Days Past Due in the last 3 years
55	Cash Advance Fee	55	Interest Type in Current Month	49	Interest Type
56	Annual/Monthly Fee	56	APR at Cycle end	50	APR (Retail) at Cycle End
57	Debt Suspension Fee	57	Fee Type	52	combo of 52-58
58	Balance Transfer Fee	58	Account Status - Active	65	combo of 65-69
59	Other Fee	59	Month-end Account Status - Closed	64	Closed or Revoked Account at Month End
60	Debt Suspension/Cancellation Program Enrollment	60	Collection Re-age Date	75	Collection Reage Date
61	Debt Suspension/Cancellation Program Active	61	Charge-off Reason	78	Charge-off Reason
62	Active at Month End in Last Twelve Months	62	Gross Charge-off Amount - current month	79	combo of 79/80
63	Account Open at Month End	63	Recovery Amount - current month	81	Recovery Amount
64	Closed or Revoked Account at Month End	64	Purchase amount	83	Purchase Volume
65	Active at Cycle End in Last Twelve Months	65	Cash Advance Amount	84	Cash Advance Volume
66	Account Open at Cycle End	66	Balance Transfer Amount	85	Balance Transfer /

					<b>Convenience Check Volume</b>
67	Closed or Revoked Account at Cycle End	67	Convenience Check Amount		
68	Account Closed at Request of Customer at Month End	68	Account Sold Flag	<b>86</b>	<b>Account Sold to Third Party</b>
69	Account Closed at Request of Customer at Cycle End	69	Bankruptcy Flag		
70	Skip A Payment	70	Loss Sharing		
71	Credit Card Workout Program	71	Basel II - PD		
72	Credit Card Workout Program Type	72	Basel II - LGD		
73	Forbearance/Workout Programs Performance Status	73	Basel II - ELGD		
74	Settlement Portion Charged- Off/Forgiven	74	Basel II - EAD		
75	Collection Reage Date	75	Basel II - EAD id segment		
76	Customer Service Reage Date				
77	Loan Charged-off in current month				
78	Charge-off Reason				
79	Principal Loss/Charge-off Amount in current month				
80	Interest Loss/Charge-off Amount in current month				
81	Recovery Amount				
82	Account Fraud in current month				
83	Purchase Volume				
84	Cash Advance Volume				
85	Balance Transfer / Convenience Check Volume				
86	Account Sold to Third Party				

## **Annex B**

### **Requests for Clarification**

#### Requests for Clarification

##### **Operational Risk Data Schedule**

- It is unclear how an institution should report events that are no longer a concern. For example, it is possible, though not common, that an event that was previously reported should be dropped. This could be due to the additional information obtained in the current quarter, which could indicate that the event is actually not an operation risk event. Similarly, a bank may exit a business line. It is unclear how a bank should report data on a business line that they no longer engage in. We respectfully request that the Board provide reporting banks guidance on how to report these events that are not relevant to a forward looking capital planning process.
- It is unclear what a bank should submit for the first quarterly operational risk schedule. Some banks believe the full data set and history needs to be provided. Other banks believe that only “new” loss events captured in a bank’s loss database during the current reporting quarter need to be reported. We respectfully request that the Board clarify what data is expected in the first report.
- It is unclear how Banks should identify and denote events from acquired or merged entities. Column N on the proposed Operational Loss Data Collection template requires Banks to denote whether a loss event originated from an acquired or merged entity. It is unclear as to the time frame an entity would be considered acquired or merged after the acquisition date. We respectfully request that the Board clarify that events originating from acquired or merged entities means events that have a capture date prior to the acquisition or alternatively, eliminate this descriptive element.
- It is unclear how Banks should indicate whether an event is included in its operational risk quantification model. Column O on the proposed operational loss data collection template requires Banks to denote whether an individual loss event is included in its operational risk quantification model. This request is unclear in its intent, as Banks have varying frequencies in updating their quantification model and there is a high probability that none of the loss events submitted in the quarterly submission cycles, as proposed, would be included in the quantification model that has produced the current operational risk capital. We respectfully request that the Board clarify that included in the operational risk quantification model means inclusion in the model dataset that has produced the current operational risk capital amounts.

##### **Address matching Loan Level Data Schedule**

- Please provide clarity for data item #10 (Liquidation Status) of the FR Y-14M Address matching Loan Level Data Collection Schedule. We respectfully request that the Board clarify of Liquidation Status 0, it is our interpretation which suggest Liquidated not paid in full implies a loan that was liquidated at a loss. Furthermore please clarify which status an Open and Active loan would qualify for.

### **FR Y-14M Domestic First Lien Closed-End 1-4 Family Schedule**

- Please provide for clarity for data item #12 (DTI Ratio (Front-End) at origination) of the FR Y-14M Domestic First Lien Closed-End 1-4 Family Collection Schedule. The detailed description of the variable includes the following language “Alternatively, gross monthly income – refreshed at modification” although the variable name indicates at origination. We respectfully request that the Board clarify that is variable should be populated at origination and if the loan has been modified the value at modification usurps the at origination value.
- Please provide clarity for data item #15 (Credit Class) of the FR Y-14M Domestic First Lien Closed-End 1-4 Family Collection Schedule. We respectfully request that the Board clarify the definitions of Prime and Non-Prime.
- Please provide clarity for data item #19 (Product Type) of the FR Y-14M Domestic First Lien Closed-End 1-4 Family Collection Schedule. As the request currently stands it does not provide the logic needed to create a hierarchal choice e.g. 5 Yr IO ARM Balloon. We respectfully request that the Board clarify this product type hierarchy.
- Please provide clarity for data item #19 (Product Type) data options 1I, 2I, UI and UU of the FR Y-14M Domestic First Lien Closed-End 1-4 Family Collection Schedule. These options appear conflicting in their definitions. We respectfully request that the Board clarify that 1I means the loan is a fixed rate interest only but unknown interest only term. We respectfully request that the Board clarify that 2I means the loan is a variable rate, interest only loan but the interest only term is unknown. We respectfully request that the Board clarify that UI means the loan is interest only but the rate structure and the interest only term are unknown. We respectfully request that the Board clarify that UU implies the rate structure, the interest only classification and the interest only term are unknown.
- Please provide clarity for data item #29 (Recourse Flag) of the FR Y-14M Domestic First Lien Closed-End 1-4 Family Collection Schedule. We respectfully request that the Board clarify the definition of Recourse.
- Please provide clarity for data item #30 (ARM Index) of the FR Y-14M Domestic First Lien Closed-End 1-4 Family Collection Schedule. It is unclear how this variable will be populated for Fixed Rate loans. We respectfully request that the Board clarify how to populate ARM index for fixed rate loans.
- Please provide clarity for data item #47 (Original Interest Rate) of the FR Y-14M Domestic First Lien Closed-End 1-4 Family Collection Schedule. It is interpreted for ARM's that this item will be equivalent to #30 (ARM Initial Rate), is it necessary to provide both? We respectfully request that the Board clarify that item #30 is necessary.

- Please provide clarity for data item #53 (Investor Type) of the FR Y-14M Domestic First Lien Closed-End 1-4 Family Collection Schedule. It is unclear the proper categorization to apply for whole loans sold privately with servicing retained. We respectfully request that the Federal Reserve clarify the category to use for whole loans sold privately with servicing retained.
- Please provide clarity for data items #61 (Scheduled Principal Balance Amount) and #63 (Principal Balance Amount) of the FR Y-14M Domestic First Lien Closed-End 1-4 Family Collection Schedule. The Detailed Descriptions do not provide enough information to determine the difference between these two fields. We respectfully request that the Board clarify the definitions of Scheduled Principal Balance Amount and Principal Balance.
- Please provide clarity for data item #94 (Interest Type Conversion Duration) of the FR Y-14M Domestic First Lien Closed-End 1-4 Family Collection Schedule. It is unclear if this variable should only be populated for loans under loss mitigation purposes or if this variable includes convertible ARMs. We respectfully request that the Board clarify if Interest Type Conversion Duration should only be populated as a result of Loss Mitigation.
- Please provide clarity for data item #100 (Credit Enhancement Amount) of the FR Y-14M Domestic First Lien Closed-End 1-4 Family Collection Schedule. We respectfully request that the Board clarify the definition of Credit Enhancement.

#### **FR Y-14M Home Equity Loan and Home Equity Line of Credit Schedule**

- Please provide clarity for data item #6 (Original Loan Amount) of the FR Y-14M Home Equity Loan and Home Equity Line of Credit Collection Schedule. We respectfully request that the Board clarify that they desire this variable to include the Draw Amount at origination for Open End Lines and the Loan Amount at origination for Closed End Loans.
- Please provide clarity for data item #30 (ARM Index) of the FR Y-14M Home Equity Loan and Home Equity Line of Credit Collection Schedule. We respectfully request that the Board clarify how this field should be populated for a loan that was originated as an ARM and is currently a Fixed Rate.
- Please provide clarity for data item #30 (ARM Index) through item # 37 (ARM Periodic Pay Floor) of the FR Y-14M Home Equity Loan and Home Equity Line of Credit Collection Schedule. We respectfully request that the Board clarify how these variables would be populated for Fixed Rate loans.
- Please provide clarity for data item #45 (Total payment due) and #46 (Principal and Interest (P&I) amount current) of the FR Y-14M Home Equity Loan and Home Equity Line of Credit Collection Schedule. We respectfully request that the Board clarify how these variables are different from one another.

- Please provide clarity for data item #50 (Loan Status (MBA Method) of the FR Y-14M Home Equity Loan and Home Equity Line of Credit Collection Schedule. We respectfully request that the Board clarify the hierarchy for this variable e.g. a loan that is 90+ days and FC or FC and Servicing Sold Released. We further request clarity on whether a BHC is allowed to report delinquency status using the OTS method.
- Please provide clarity for data item #55 (Paid-in-Full Coding) of the FR Y-14M Home Equity Loan and Home Equity Line of Credit Collection Schedule. We respectfully request that the Board clarify how to classify servicing released loans.
- Please provide clarity for data item #59 (Liquidation Status) and item #55 Paid-in-full coding) of the FR Y-14M Home Equity Loan and Home Equity Line of Credit Collection Schedule. We respectfully request that the Board clarify how these variables are different.
- Please provide clarity for data item #63 (Interest Rate Frozen) of the FR Y-14M Home Equity Loan and Home Equity Line of Credit Collection Schedule. We respectfully request that the Board clarify how to handle converted loans (was ARM now fixed).
- Please provide clarity for data item #69 (Credit Line Frozen) and data item #75 (Credit Line Closed Flag) of the FR Y-14M Home Equity Loan and Home Equity Line of Credit Collection Schedule. We respectfully request that the Board clarify how these two variables are different.

#### **FR Y-14M Credit Card Schedule**

- In data item #10 of the FR Y-14M Card Collection, we respectfully request that the Board clarify the definition of “Revolve Feature.”
- Please provide clarity for data item #20 of the FR Y-14M Card Collection. The corresponding field in the existing OCC report is not required due to the complexity of derivation. Is this required or can we report as blank due to complexity?
- In data item #27 of the FR Y-14M Card Collection, we respectfully request that the Board clarify whether it is acceptable for a bank to use a default date in YYYYMMDD format rather than a numeric number if acquisition or merger date is unknown (e.g. 19000101).
- Please provide clarity on data item #31 of the FR Y-14M Card Collection and how banks should code for more than 9 authorized users. Data item #31 has only one numeric position. Banks propose to code “9” for cards with 9 or greater authorized users.
- Please provide clarity on data item #33 and #34 of the FR Y-14M Card Collection when an account has been purchased or acquired. If an account was purchased or acquired, “at

origination data” may not be available. Should these fields be left blank or populated with “at acquisition data”?

- Please provide clarity for data item #63 of the FR Y-14M Card Collection on how bulk recoveries not tied to a specific loan should be allocated.
- Please provide clarity on data item #70 of the FR Y-14M Card Collection “Loss Sharing.” It is unclear what accounts would fall into this category.
- Please provide clarity on data item #73 of the FR Y-14M Card Collection “Basel II – ELGD.” Many banks currently track LGD, but not ELGD. Should banks populate this field with LGD, or leave blank?

### **FR Y-14Q Corporate Loan Schedule**

- Please provide clarity for the term “Obligor Financial Information.” In this context, it is our interpretation that the Board is referencing the primary borrower, co-borrowers, or risk unit (collection of obligors and guarantors grouped to determine risk), when it uses the term “Obligor”. Considering the intended purpose is to determine PD rates for the note being reported, we respectfully request that the Board clarify that for the purpose of the request Obligor could be defined as the risk unit underwritten by the BHC for the purpose of approving the loan, rather than the primary borrower, or some other collection of borrowers.
- Please provide clarity on data item #35, “Lien Position.” The description does not include instruction if the facility is secured by different lien positions on different items of collateral. We respectfully request that the Federal Reserve clarify what integer should be entered when the facility is secured by a first lien on certain collateral and a second lien on other collateral.
- Please provide clarity on data item #38, “Interest Rate.” The description requests that the interest rate be approximated for facilities with multiple draws with different interest rates. We respectfully request that the Federal Reserve clarify if the interest rate should be approximated on a pro-rata basis, simple average, or other method.
- Please provide clarity on data item #66 of the Corporate Loan Schedule whether a bank should report fixed assets gross or net of depreciation?
- The new guarantor data fields appear to be structured to accept information for only one guarantor per reported facility. How should the reporting banks handle facilities supported by more than one guarantor? Should they report information for only the primary or most substantial guarantor?
- It appears that only permanent (non-construction) owner-occupied real estate loans secured by non-farm, non-residential properties should be moved from the CRE to the wholesale submission. Please confirm that all owner-occupied construction loans should remain on the CRE submission.

**FR Y-14Q Commercial Real Estate Schedule**

- Please provide clarity for the item “Acquired Loan”. When a loan was acquired but has since been renewed or modified by the reporting Bank, it is unclear if it should still be reported as an acquired loan. We respectfully request that the Federal Reserve clarify whether or not to identify loans that were acquired but have since been renewed or modified by the reporting Bank as an acquired loan.



## **Annex C**

### **About the Signatories**

The American Bankers Association represents banks of all sizes and charters and is the voice for the nation's \$13 trillion banking industry and its 2 million employees. Learn more at [www.aba.com](http://www.aba.com).

Established in 1853, The Clearing House is the oldest banking association and payments company in the United States. It is owned by the world's largest commercial banks, which collectively employ over 2 million people and hold more than half of all U.S. deposits. The Clearing House Association L.L.C. is a nonpartisan advocacy organization representing—through regulatory comment letters, amicus briefs and white papers—the interests of its owner banks on a variety of systemically important banking issues. Its affiliate, The Clearing House Payments Company L.L.C., provides payment, clearing, and settlement services to its member banks and other financial institutions, clearing almost \$2 trillion daily and representing nearly half of the automated-clearing-house, funds-transfer, and check-image payments made in the U.S. *See* The Clearing House's web page at [www.theclearinghouse.org](http://www.theclearinghouse.org).

The Financial Services Roundtable represents 100 of the largest integrated financial services companies providing banking, insurance, and investment products and services to the American consumer. Member companies participate through the Chief Executive Officer and other senior executives nominated by the CEO. Roundtable member companies provide fuel for America's economic engine, accounting directly for \$92.7 trillion in managed assets, \$1.2 trillion in revenue, and 2.3 million jobs. *See* the Financial Services Roundtable's web page at <http://www.fsround.org>.